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Attorneys for Defendant
TRANSUNION LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

NOEMIA CARVALHO, on behalf of herself
and other similarly situated people,

Plaintiff,

vs.

CREDIT CONSULTING SERVICES, INC.,
dba CCS, EQUIFAX CREDIT
INFORMATION SERVICES, LLC,
EXPERIAN INFORMATION SOLUTIONS,
INC., TRANS UNION LLC, and DOES 1-50,
inclusive,

Defendants.

Case No. 5:08-cv-01317-JF-HRL

**STIPULATION TO TAKE HEARING ON
MOTION OF DEFENDANT
TRANSUNION LLC TO COMPEL
PRODUCTION OF DOCUMENTS OFF
CALENDAR**

Current Hearing Date

Date: June 24, 2008

Time: 10:00 a.m.

Crtrm: 2

LA 51064177

**STIPULATION TO TAKE HEARING ON MOTION OF DEFENDANT TRANSUNION LLC TO COMPEL
PRODUCTION OF DOCUMENTS OFF CALENDAR**

Case No. 5:08-cv-01317-JF-HRL

STIPULATION

WHEREAS, on May 13, 2008, defendant TransUnion LLC (“TransUnion”) filed a Motion to Compel Production of Documents (the “Motion”), which currently is set for hearing on June 24, 2008; and

WHEREAS, on May 27, 2008, plaintiff Noemia Carvalho (“Plaintiff”) filed her Opposition to the Motion; and

WHEREAS, on June 3, 2008, TransUnion filed its Reply in support of the Motion; and

WHEREAS, on June 20, 2008, Plaintiff requested that TransUnion withdraw the Motion in exchange for production of the documents TransUnion sought by the Motion; and

WHEREAS, TransUnion agreed to withdraw the Motion in exchange for Plaintiff’s production of the documents on June 23, 2008.

IT IS HEREBY STIPULATED, by and between TransUnion and Plaintiff, through their counsel of record, that the Motion is withdrawn, the June 24, 2008 hearing on the Motion be vacated and that neither side be awarded sanctions.

Dated: June 23, 2008

STROOCK & STROOCK & LAVAN LLP
JULIA B. STRICKLAND
STEPHEN J. NEWMAN
BRIAN C. FRONTINO

By: /s/ Brian C. Frontino
Brian C. Frontino

Attorneys for Defendant
TRANSUNION LLC

Dated: June 23, 2008

LAW OFFICES OF RON BOCHNER
RON K. BOCHNER

By: /s/ Ron K. Bochner
Ron K. Bochner

Attorney for Plaintiff
NOEMIA CARVALHO

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Case No. 5:08-cv-01317-JF-HRL

**[PROPOSED] ORDER GRANTING
STIPULATION TO TAKE HEARING ON
MOTION OF DEFENDANT
TRANSUNION LLC TO COMPEL
PRODUCTION OF DOCUMENTS OFF
CALENDAR**

Current Hearing Date

Date: June 24, 2008

Time: 10:00 a.m.

Crtrm: 2

[PROPOSED] ORDER

It is hereby ORDERED that the Notice of Motion and Motion of defendant TransUnion LLC to Compel Production of Documents by plaintiff Noemia Carvalho filed on May 13, 2008 is withdrawn and the hearing on such Motion currently set for hearing on June 24, 2008 is vacated. No sanctions are awarded to either party.

IT IS SO ORDERED.

DATED: _____, 2008

Honorable Howard R. Lloyd
United States Magistrate Judge

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